

1
2 UNITED STATES DISTRICT COURT

3 EASTERN DISTRICT OF NEW YORK

4 Case No. 1:23-cv-00369-NRM-RML

5 -----x

6 UNITED STATES OF AMERICA,

7 Plaintiff,

8
9 - against -

10
11 RARE BREED TRIGGERS, LLC; RARE BREED

12 FIREARMS, LLC; LAWRENCE DEMONICO, KEVIN

13 MAXWELL,

14 Defendants.

15 -----x

16 July 14, 2023

17 9:39 a.m.

18
19 Remote video-teleconference
20 deposition via Zoom of ANTHONY CIRAVOLO,
21 pursuant to notice, before Jineen Pavesi,
22 a Registered Professional Reporter,
23 Registered Merit Reporter, Certified
24 Realtime Reporter and Notary Public of the
25 State of New York.

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2 A P P E A R A N C E S :

3 BREON PEACE

UNITED STATES ATTORNEY

4 EASTERN DISTRICT OF NEW YORK

225 Cadman Plaza East

5 Brooklyn, New York 11201

Attorneys for Plaintiff

6 BY: MICHAEL BLUME, ESQ.

michael.blume@usdoj.gov

7 PAULINA STAMATELOS, ESQ.

pauline.stamatelos@usdoj.gov

8 DAVID COOPER, ESQ.

david.cooper@usdoj.gov

9
10 DHILLON LAW GROUP INC.

50 Park Place, Suite 1105

11 Nwark, New Jeresy 07102

Attorneys for Defendants

12 BY: JOSIAH CONTARINO, ESQ.

jcontarino@dhillonlw.com

13
14 DHILLON LAW GROUP INC.

177 Post Street, Suite 700

15 San Francisco, California 94108

Attorneys for Defendants

16 BY: MICHAEL A. COLUMBO, ESQ.

mcolumbo@dhillonlaw.com

17
18 ALSO PRESENT:

19 ERICA BRANGWYNNE, ATF

20 KEVIN McCAULEY, ATF

21 HOLLY LUDVIGSEN, ATF

22 BEN HILLER, ATF

23 KEVIN MAXWELL

24 LAWRENCE DeMONICO

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1 CIRAVOLO

2 The documents that I review, I
3 review them to determine ATF's prior
4 classification history, possible other
5 determinations that show similar devices
6 in operation or principle, but they don't
7 necessarily bear an effect on my direct
8 examination of that item or my final
9 classification of that item.

10 Q. Would those prior
11 classifications be examples of
12 documents -- prior classifications of
13 other similar devices, I think that's the
14 best I can do with how you phrased it?

15 A. Generally speaking, yes.

16 Q. Are those prior classifications
17 an example of documents that you reviewed
18 but did not rely on in forming your
19 conclusion for this expert report?

20 A. I don't rely on them in the
21 sense of it helps me determine what the
22 device I'm currently examining is.

23 I rely on them to see that my
24 classification is consistent with prior
25 classifications of similar devices.

1 CIRAVOLO

2 trigger, what would a user have to do to
3 fire another round?

4 A. Nothing, they would simply
5 maintain the constant rearward pressure
6 that they were doing.

7 If they released the trigger
8 completely, as in no contact with the
9 trigger, they would have to place their
10 finger back on the trigger and initiate
11 another firing sequence.

12 Q. And what does it mean to
13 initiate another firing sequence?

14 A. It means to engage the trigger
15 of the host firearm and in an AR-15 type
16 firearm, that's done by making contact
17 with the trigger and then pulling it to
18 the rear.

19 Q. Can you pull the trigger in the
20 FRT-15 without engaging another firing
21 sequence?

22 A. No, you cannot; once you
23 initiate the initial firing sequence, the
24 cycle is continued.

25 Q. What if there is slack in the